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20 Attorney for Plaintiffs

21 IN THE UNITED STATES DISTRICT COURT  
22 FOR THE NORTHERN DISTRICT OF CALIFORNIA

23 SAN FRANCISCO/OAKLAND DIVISION

24 **ALAMEDA COUNTY MALE PRISONERS**  
25 And Former Prisoners, DANIEL GONZALEZ,  
26 et al. on behalf of themselves and others  
27 similarly situated, as a Class, and Subclass  
28 **PLAINTIFFS,**

29 vs.

30 **ALAMEDA COUNTY SHERIFF'S**  
31 **OFFICE, et al**

32 **DEFENDANTS.**

33 No. 3:19-cv-07423 JSC

34 **PLAINTIFFS AND DEFENDANT**  
35 **WELLPATH MANAGEMENT, INC.'S**  
36 **JOINT STATEMENT RE:**  
37 **DISCOVERY DISPUTE -**  
38 **ATTACHMENT A**

39 DATE: October 19, 2023  
40 TIME: 9:30 a.m.  
41 LOC.: 450 Golden Gate Ave.,  
42 San Francisco, CA 94102  
43 DEPT.: Courtroom 8, 19th Floor

44 Hon. Jacqueline S. Corley, Presiding

1 Peter G. Bertling [SBN 131602]  
2 Jemma Parker Saunders [SBN 227962]  
3 Bertling Law Group  
4 21 East Canon Perdido Street, Suite 204B  
5 Santa Barbara, CA 93101  
6 Telephone: 805-879-7558  
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8 Attorneys for Defendant  
9 WELLPATH MANAGEMENT, INC.  
10

11 **UNITED STATES DISTRICT COURT  
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 **ALAMEDA COUNTY MALE  
14 PRISONERS** And Former Prisoners,  
15 DANIEL GONZALEZ, et al. on behalf of  
16 themselves and others similarly situated, as  
17 a Class, and Subclass; ALAMEDA  
18 COUNTY FEMALE PRISONERS And  
19 Former Prisoners, JACLYN  
20 MOHRBACHER, ERIN ELLIS,  
21 DOMINIQUE JACKSON, CHRISTINA  
22 ZEPEDA, ALEXIS WAH, AND KELSEY  
23 ERWIN, et al on behalf of themselves and  
24 other similarly situated,

25 Plaintiffs,

26 v.

27 **ALAMEDA COUNTY SHERIFF'S  
28 OFFICE, ALAMEDA COUNTY**, Deputy  
Joe, Deputy Ignont (sp) Jane ROEs, Nos. 1  
– 25; **WELLPATH MANAGEMENT,  
INC.**, a Delaware Corporation (formerly  
known as California Forensic Medical  
Group) a corporation; its Employees and  
Sub-Contractors, and Rick & Ruth ROEs  
Nos. 26-50; **ARAMARK  
CORRECTIONAL SERVICES, LLC**, a  
Delaware Limited Liability Company; its  
Employees and Sub-Contractors, and Rick  
& Ruth ROES Nos. 51-75,

Defendants.

Case No.: 3:19-cv-07423 JSC

DEFENDANT WELLPATH  
MANAGEMENT, INC.'S  
INITIAL DISCLOSURES  
[FRCP RULE 26 (a)]

Action Filed: November 12, 2019  
Judge: Hon. Jacqueline Scott Corley  
Ctrm: E—15th Floor

1           In accordance with Federal Rules of Civil Procedure Rule 26(a), Defendant  
 2 WELLPATH hereby provides the names of witnesses and identity of documents  
 3 currently available to her. This information is based on Defendant's information and  
 4 beliefs, known to her at the time of this initial disclosure, and is made with the  
 5 understanding that investigation and discovery in this matter have only recently  
 6 commenced. Defendant reserves the right to supplement, change, or correct the within  
 7 information as additional facts are discovered and documents located.

8           **I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE  
 9 INFORMATION**

10          1. Plaintiff Daniel Gonzalez, c/o Law Offices of Yolanda Huang, will testify  
 11 regarding the medical care he received as an inmate at Santa Rita Jail including denial of  
 12 medical care and denied access to food that is adequate to maintain health.

13          2. Plaintiff Lawrence Gerrans, c/o Law Offices of Yolanda Huang, will testify  
 14 regarding the medical care he received as an inmate at Santa Rita Jail including denial of  
 15 medical care and denied access to food that is adequate to maintain health.

16          3. Plaintiff Cedric Henry, c/o Law Offices of Yolanda Huang, will testify  
 17 regarding the medical care he received as an inmate at Santa Rita Jail including denial of  
 18 medical care and denied access to food that is adequate to maintain health.

19          4. Plaintiff Michael Lockhart, c/o Law Offices of Yolanda Huang, will testify  
 20 regarding the medical care he received as an inmate at Santa Rita Jail including denial of  
 21 medical care and denied access to food that is adequate to maintain health.

22          5. Plaintiff Randy Harris, c/o Law Offices of Yolanda Huang, will testify  
 23 regarding the medical care he received as an inmate at Santa Rita Jail including denial of  
 24 medical care and denied access to food that is adequate to maintain health.

25          6. Plaintiff Eric Rivera, c/o Law Offices of Yolanda Huang, will testify  
 26 regarding the medical care he received as an inmate at Santa Rita Jail including denial of  
 27 medical care and denied access to food that is adequate to maintain health.

28          ///

1       7. Plaintiff David Misch, c/o Law Offices of Yolanda Huang, will testify  
 2 regarding the medical care he received as an inmate at Santa Rita Jail including denial of  
 3 medical care and denied access to food that is adequate to maintain health.

4       8. Plaintiff Tikisha Upshaw, c/o Law Offices of Yolanda Huang, will testify  
 5 regarding the medical care she received as an inmate at Santa Rita Jail including denial of  
 6 medical care and denied access to food that is adequate to maintain health.

7       9. Plaintiff Eric Wayne, c/o Law Offices of Yolanda Huang, will testify  
 8 regarding the medical care he received as an inmate at Santa Rita Jail including denial of  
 9 medical care and denied access to food that is adequate to maintain health.

10      10. Plaintiff James Mallett, c/o Law Offices of Yolanda Huang, will testify  
 11 regarding the medical care he received as an inmate at Santa Rita Jail including denial of  
 12 medical care and denied access to food that is adequate to maintain health.

13      11. Plaintiff Rasheed Tucker, c/o Law Offices of Yolanda Huang, will testify  
 14 regarding the medical care he received as an inmate at Santa Rita Jail including denial of  
 15 medical care and denied access to food that is adequate to maintain health.

16      12. Plaintiff Darryl Geyer, c/o Law Offices of Yolanda Huang, will testify  
 17 regarding the medical care he received as an inmate at Santa Rita Jail including denial of  
 18 medical care and denied access to food that is adequate to maintain health.

19      13. Plaintiff Timothy Phillips, c/o Law Offices of Yolanda Huang, will testify  
 20 regarding the medical care he received as an inmate at Santa Rita Jail including denial of  
 21 medical care and denied access to food that is adequate to maintain health.

22      14. Plaintiff Donald Corsetti, c/o Law Offices of Yolanda Huang, will testify  
 23 regarding the medical care he received as an inmate at Santa Rita Jail including denial of  
 24 medical care and denied access to food that is adequate to maintain health.

25      15. Plaintiff Tiara Arnold, c/o Law Offices of Yolanda Huang, will testify  
 26 regarding the medical care she received as an inmate at Santa Rita Jail including denial of  
 27 medical care and denied access to food that is adequate to maintain health.

28      16. Individuals from or identified by Plaintiffs.

1       17. Individuals from defendant entity County of Alameda to be identified by this  
2 Defendant, including, but not limited to, custody staff and Deputies who had interaction  
3 with Plaintiffs.

4       18. Individuals from defendant entity Aramark Correctional Services, LLC, to  
5 be identified by this Defendant, including, but not limited to, staff who had interaction  
6 with Plaintiffs.

7       19. Plaintiff Daniel Gonzalez's preceding treating medical care providers to be  
8 identified during discovery including, but not limited to Santa Clara Valley Medical  
9 Center and Stanford Health Care.

10       20. Plaintiff Lawrence Gerrans' preceding treating medical care providers to be  
11 identified during discovery including, but not limited to Labcorp and CVS Pharmacy.

12       21. Plaintiff Cedric Henry's preceding treating medical care providers to be  
13 identified during discovery.

14       22. Plaintiff Michael Lockhart's preceding treating medical care providers to be  
15 identified during discovery.

16       23. Plaintiff Randy Harris' preceding treating medical care providers to be  
17 identified during discovery including, but not limited to Diagnostic Laboratories and  
18 Labcorp.

19       24. Plaintiff Eric Rivera's preceding treating medical care providers to be  
20 identified during discovery including, but not limited to Invview Imaging.

21       25. Plaintiff Tikisha Upshaw's preceding treating medical care providers to be  
22 identified during discovery.

23       26. Plaintiff Eric Wayne's preceding treating medical care providers to be  
24 identified during discovery including, but not limited to UCSF.

25       27. Plaintiff James Mallet's preceding treating medical care providers to be  
26 identified during discovery.

27       28. Plaintiff Rasheed Tucker's preceding treating medical care providers to be  
28 identified during discovery.

1       29. Plaintiff Timothy Phillips' preceding treating medical care providers to be  
 2 identified during discovery including, but not limited to UCSF and Labcorp.

3       30. Plaintiff Donald Corsetti's preceding treating medical care providers to be  
 4 identified during discovery including, but not limited to Stanford Health Care, Labcorp,  
 5 and Inview Imaging.

6       31. Onsite emergency medical services personnel who provided care to  
 7 plaintiffs.

8       32. Maria Magat, M.D., c/o Bertling Law Group, will testify regarding treatment  
 9 and care of Mr. Gonzalez, Mr. Corsetti, Mr. Rivera, Mr. Gerrans, Mr. Lockhart, Mr.  
 10 Harris, Mr. Phillips, Mr. Geyer, Mr. Mallett, Mr. Wayne, and Ms. Upshaw. Testimony  
 11 regarding CFMG's policies, procedures, and protocols for inmates.

12       33. Jess Waldura, M.D., c/o Bertling Law Group, will testify regarding  
 13 treatment and care of Mr. Henry, Mr. Gonzalez, Mr. Rivera, Mr. Gerrans, Mr. Lockhart,  
 14 Mr. Phillips, Mr. Geyer, Mr. Mallett, and Mr. Wayne.

15       34. Szilvia Molitorisz, M.D., c/o Bertling Law Group, will testify regarding  
 16 treatment and care of Mr. Henry, Mr. Gonzalez, Mr. Corsetti, Mr. Rivera, Mr. Lockhart,  
 17 Mr. Phillips, Mr. Geyer, and Mr. Mallett.

18       35. Pardeep Kahlon, M.D., c/o Bertling Law Group, will testify regarding  
 19 treatment and care of Mr. Henry, Mr. Gonzalez, Mr. Corsetti, Mr. Rivera, Mr. Lockhart,  
 20 Mr. Phillips, Mr. Geyer, Mr. Mallett, and Mr. Wayne.

21       36. Alden Harken, M.D., c/o Bertling Law Group, will testify regarding  
 22 treatment and care of Mr. Henry, Mr. Gonzalez, Mr. Corsetti, Mr. Rivera, Mr. Lockhart,  
 23 Mr. Harris, Mr. Phillips, Mr. Tucker, Mr. Mallett, and Mr. Wayne.

24       37. Lane Melgarejo, M.D., c/o Bertling Law Group, will testify regarding  
 25 treatment and care of Mr. Hennry, Mr. Lockhart, Mr. Harris, Mr. Phillips, Mr. Geyer, and  
 26 Mr. Mallett.

27       38. John Nienow, M.D., c/o Bertling Law Group, will testify regarding  
 28 treatment and care of Mr. Rivera, Mr. Lockhart, and Mr. Phillips.

1       39. Sambrajya Palagummi, M.D., c/o Bertling Law Group, will testify regarding  
 2 treatment and care of Mr. Henry, Mr. Gonzalez, Mr. Corsetti, Mr. Gerrans, Mr. Harris,  
 3 Mr. Phillips, Mr. Tucker, Mr. Mallett, and Mr. Wayne.

4       40. Indu Talwar, M.D., c/o Bertling Law Group, will testify regarding treatment  
 5 and care of Mr. Henry, Mr. Phillips, and Mr. Wayne.

6       41. Josephine Agbowo, M.D., c/o Bertling Law Group, will testify regarding  
 7 treatment and care of Mr. Corsetti, Mr. Harris, Mr. Phillips, Mr. Mallett, and Mr. Wayne.

8       42. Kerry-Ann Kelly, M.D., c/o Bertling Law Group, will testify regarding  
 9 treatment and care of Mr. Corsetti, Mr. Lockhart, Mr. Rivera, Mr. Phillips, and Mr.  
 10 Mallett.

11       43. Prithvi Shankar, M.D., c/o Bertling Law Group, will testify regarding  
 12 treatment and care of Mr. Corsetti and Mr. Phillips.

13       44. Conrad Schmitt, M.D., c/o Bertling Law Group, will testify regarding  
 14 treatment and care of Mr. Corsetti.

15       45. Asaad Traina, M.D., c/o Bertling Law Group, will testify regarding  
 16 treatment and care of Mr. Corsetti and Mr. Rivera.

17       46. Peter Slaubaugh, M.D., c/o Bertling Law Group, will testify regarding  
 18 treatment and care of Mr. Harris, Mr. Mallett, Mr. Wayne, and Mr. Geyer.

19       47. Rajendra Mahajan, M.D., c/o Bertling Law Group, will testify regarding  
 20 treatment and care of Mr. Corsetti and Mr. Harris.

21       48. Hector Luz, R.N., c/o Bertling Law Group, will testify regarding treatment  
 22 and care of Mr. Gerrans.

23       49. Carol Stevenson, R.N., c/o Bertling Law Group, will testify regarding  
 24 treatment and care of Mr. Gerrans.

25       50. Hyun Choi, R.N., c/o Bertling Law Group, will testify regarding treatment  
 26 and care of Mr. Henry.

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1       51. Navdeep Kaur, R.N., c/o Bertling Law Group, will testify regarding  
2 treatment and care of Mr. Henry, Mr. Corsetti, Mr. Lockhart, Mr. Harris, Mr. Tucker, Mr.  
3 Mallett, and Mr. Wayne.

4       52. Dashmeet Kaur, R.N., c/o Bertling Law Group, will testify regarding  
5 treatment and care of Mr. Gonzalez, Mr. Corsetti, Mr. Rivera, Mr. Lockhart, Mr. Harris,  
6 and Ms. Upshaw.

7       53. Thomas Bacon, R.N., c/o Bertling Law Group, will testify regarding  
8 treatment and care of Mr. Lockhart.

9       54. Maryna Clark, R.N., c/o Bertling Law Group, will testify regarding  
10 treatment and care of Mr. Lockhart.

11       55. Mary Anne Fahey, R.N., c/o Bertling Law Group, will testify regarding  
12 treatment and care of Mr. Lockhart.

13       56. Jeny Bazar, R.N., c/o Bertling Law Group, will testify regarding treatment  
14 and care of Mr. Henry, Mr. Phillips, Mr. Geyer, and Mr. Mallett.

15       57. David Donoho, R.N., c/o Bertling Law Group, will testify regarding  
16 treatment and care of Mr. Corsetti, Mr. Henry, Mr. Lockhart, Mr. Harris, Mr. Phillips,  
17 Mr. Mallett, and Mr. Wayne.

18       58. N. Malhi, R.N., c/o Bertling Law Group, will testify regarding treatment  
19 and care of Mr. Henry, Mr. Corsetti, Mr. Harris, Mr. Phillips, and Mr. Wayne.

20       59. Melynda Logan, R.N., c/o Bertling Law Group, will testify regarding  
21 treatment and care of Mr. Henry, Mr. Corsetti, Mr. Rivera, Mr. Harris, Mr. Phillips, Mr.  
22 Geyer, and Mr. Tucker.

23       60. Stella Lewis, R.N., c/o Bertling Law Group, will testify regarding treatment  
24 and care of Mr. Harris.

25       61. Kacey Lebon, R.N., c/o Bertling Law Group, will testify regarding treatment  
26 and care of Mr. Henry, Mr. Lockhart, Mr. Phillips, Mr. Geyer, Mr. Tucker, Mr. Mallett,  
27 and Mr. Wayne.

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1       62. H. Dhatt, R.N., c/o Bertling Law Group, will testify regarding treatment  
2 and care of Mr. Corsetti and Mr. Harris.

3       63. Judy Lebon, R.N., c/o Bertling Law Group, will testify regarding treatment  
4 and care of Mr. Corsetti.

5       64. D. Mageloff, R.N., c/o Bertling Law Group, will testify regarding treatment  
6 and care of Mr. Henry, Mr. Corsetti, Mr. Phillips, and Mr. Geyer.

7       65. Rosa Leider, R.N., c/o Bertling Law Group, will testify regarding treatment  
8 and care of Mr. Lockhart.

9       66. Ping Zhao, R.N., c/o Bertling Law Group, will testify regarding treatment  
10 and care of Mr. Henry, Mr. Phillips, and Ms. Upshaw.

11       67. Pearlie Almeyda, R.N., c/o Bertling Law Group, will testify regarding  
12 treatment and care of Mr. Henry, Mr. Corsetti, Mr. Rivera, Mr. Harris, and Mr. Wayne.

13       68. Rasheesa Shipp, R.N., c/o Bertling Law Group, will testify regarding  
14 treatment and care of Mr. Henry, Mr. Corsetti, Mr. Lockhart, Mr. Phillips, Mr. Wayne,  
15 and Ms. Upshaw.

16       69. Sapandeep Baath, R.N., c/o Bertling Law Group, will testify regarding  
17 treatment and care of Mr. Henry and Mr. Corsetti.

18       70. Mira Yune, R.N., c/o Bertling Law Group, will testify regarding treatment  
19 and care of Mr. Henry and Mr. Corsetti.

20       71. Rachel Yohannes, R.N., c/o Bertling Law Group, will testify regarding  
21 treatment and care of Mr. Henry and Mr. Lockhart.

22       72. Gabriela Pamintuan, R.N., c/o Bertling Law Group, will testify regarding  
23 treatment and care of Mr. Henry and Mr. Rivera.

24       73. Regina Renee Hallera, R.N., c/o Bertling Law Group, will testify regarding  
25 treatment and care of Mr. Henry, Gonzalez, Mr. Rivera, Mr. Tucker, and Ms. Upshaw.

26       74. Jeffrey Cooper, R.N., c/o Bertling Law Group, will testify regarding  
27 treatment and care of Mr. Henry and Mr. Tucker.

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1       75. Joyce Laforga, R.N., c/o Bertling Law Group, will testify regarding  
 2 treatment and care of Mr. Gonzalez and Mr. Phillips.

3       76. Zenaida Gutman, R.N., c/o Bertling Law Group, will testify regarding  
 4 treatment and care of Mr. Gonzalez, Mr. Corsetti, and Mr. Lockhart.

5       77. Karen Brown, R.N., c/o Bertling Law Group, will testify regarding treatment  
 6 and care of Mr. Gonzalez, Mr. Corsetti, Mr. Phillips, and Mr. Geyer.

7       78. Anita Negen, R.N., c/o Bertling Law Group, will testify regarding treatment  
 8 and care of Mr. Corsetti.

9       79. J. Divinagracia, R.N., c/o Bertling Law Group, will testify regarding  
 10 treatment and care of Mr. Corsetti and Mr. Gerrans.

11       80. R. Washington, R.N., c/o Bertling Law Group, will testify regarding  
 12 treatment and care of Mr. Corsetti, Mr. Harris, and Mr. Wayne.

13       81. Joan Fabro, R.N., c/o Bertling Law Group, will testify regarding treatment  
 14 and care of Mr. Corsetti, Mr. Rivera, Mr. Lockhart, Mr. Phillips, and Mr. Mallett.

15       82. Zuhai Amiri, R.N., c/o Bertling Law Group, will testify regarding treatment  
 16 and care of Mr. Corsetti.

17       83. D. Lordan, R.N., c/o Bertling Law Group, will testify regarding treatment  
 18 and care of Mr. Corsetti.

19       84. Lisa Goodspeed, R.N., c/o Bertling Law Group, will testify regarding  
 20 treatment and care of Mr. Corsetti, Mr. Harris, and Mr. Mallett.

21       85. H. Singh, R.N., c/o Bertling Law Group, will testify regarding treatment  
 22 and care of Mr. Corsetti and Mr. Lockhart.

23       86. Mary Jane Ferrer, R.N., c/o Bertling Law Group, will testify regarding  
 24 treatment and care of Mr. Lockhart.

25       87. V. Singh, R.N., c/o Bertling Law Group, will testify regarding treatment  
 26 and care of Mr. Corsetti.

27       88. Sandy Yeung, R.N., c/o Bertling Law Group, will testify regarding treatment  
 28 and care of Mr. Corsetti.

1       89. K. Park, R.N., c/o Bertling Law Group, will testify regarding treatment  
2 and care of Mr. Corsetti.

3       90. Katherine Wilson, R.N., c/o Bertling Law Group, will testify regarding  
4 treatment and care of Mr. Corsetti.

5       91. K. Cantillas, R.N., c/o Bertling Law Group, will testify regarding treatment  
6 and care of Mr. Corsetti, Mr. Harris, and Mr. Tucker.

7       92. Ping Zhao, R.N., c/o Bertling Law Group, will testify regarding treatment  
8 and care of Mr. Corsetti.

9       93. Roxanna Guzman, R.N., c/o Bertling Law Group, will testify regarding  
10 treatment and care of Mr. Corsetti and Mr. Harris.

11       94. A. Mand, R.N., c/o Bertling Law Group, will testify regarding treatment and  
12 care of Mr. Corsetti, Mr. Harris, and Mr. Wayne.

13       95. Sumeet Chagger, R.N., c/o Bertling Law Group, will testify regarding  
14 treatment and care of Mr. Corsetti, Mr. Phillips, Mr. Geyer, Mr. Wayne, and Ms.  
15 Upshaw.

16       96. Grace Nekki Nacis, LPN., c/o Bertling Law Group, will testify regarding  
17 treatment and care of Mr. Harris.

18       97. Jane Mwangi, R.N., c/o Bertling Law Group, will testify regarding treatment  
19 and care of Mr. Corsetti.

20       98. Jennifer Voyne, R.N., c/o Bertling Law Group, will testify regarding  
21 treatment and care of Mr. Corsetti.

22       99. Hye Weon Hwang, R.N., c/o Bertling Law Group, will testify regarding  
23 treatment and care of Mr. Corsetti.

24       100. J. Valdez, R.N., c/o Bertling Law Group, will testify regarding treatment and  
25 care of Mr. Corsetti.

26       101. Barbara Nguyen, R.N., c/o Bertling Law Group, will testify regarding  
27 treatment and care of Mr. Corsetti.

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1 102. M. Bankhead, R.N., c/o Bertling Law Group, will testify regarding treatment  
 2 and care of Mr. Corsetti, Mr. Rivera, Mr. Harris, Mr. Phillips, and Mr. Geyer.

3 103. Maryna Clark, R.N., c/o Bertling Law Group, will testify regarding  
 4 treatment and care of Mr. Corsetti.

5 104. Kim Sadia, R.N., c/o Bertling Law Group, will testify regarding treatment  
 6 and care of Mr. Corsetti, Mr. Lockhart, Mr. Harris, Mr. Mallett, and Mr. Wayne.

7 105. Ahmad Rasuli, R.N., c/o Bertling Law Group, will testify regarding  
 8 treatment and care of Mr. Corsetti.

9 106. Shelby Moore, R.N., c/o Bertling Law Group, will testify regarding  
 10 treatment and care of Mr. Corsetti.

11 107. Evelyn Hirsch, R.N., c/o Bertling Law Group, will testify regarding  
 12 treatment and care of Mr. Corsetti, Mr. Tucker, and Mr. Geyer.

13 108. Meghean Cain, R.N., c/o Bertling Law Group, will testify regarding  
 14 treatment and care of Mr. Lockhart.

15 109. Amalia Loyola, R.N., c/o Bertling Law Group, will testify regarding  
 16 treatment and care of Mr. Corsetti and Mr. Geyer.

17 110. R. Kapoor, R.N., c/o Bertling Law Group, will testify regarding treatment  
 18 and care of Mr. Rivera.

19 111. Michael Fabito, R.N., c/o Bertling Law Group, will testify regarding  
 20 treatment and care of Mr. Rivera, Mr. Lockhart, Mr. Harris, Mr. Geyer, and Mr. Mallett.

21 112. Aryam Yohannes, R.N., c/o Bertling Law Group, will testify regarding  
 22 treatment and care of Mr. Rivera, Mr. Phillips, Mr. Tucker, Mr. Mallett, and Ms.  
 23 Upshaw.

24 113. Guadalupe Garcia, R.N., c/o Bertling Law Group, will testify regarding  
 25 treatment and care of Mr. Rivera.

26 114. Heidi Lignell, R.N., c/o Bertling Law Group, will testify regarding treatment  
 27 and care of Mr. Lockhart and Mr. Phillips.

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1       115. Samantha Johnson, R.N., c/o Bertling Law Group, will testify regarding  
 2 treatment and care of Mr. Rivera.

3       116. Sarah Tobin, R.N., c/o Bertling Law Group, will testify regarding treatment  
 4 and care of Mr. Phillips.

5       117. Mira Yune, R.N., c/o Bertling Law Group, will testify regarding treatment  
 6 and care of Mr. Phillips, Mr. Geyer, and Mr. Tucker.

7       118. Gabriela Quaglia, R.N., c/o Bertling Law Group, will testify regarding  
 8 treatment and care of Mr. Geyer and Ms. Upshaw.

9       119. Kim Sook, R.N., c/o Bertling Law Group, will testify regarding treatment  
 10 and care of Mr. Geyer.

11       120. H. Hundal, R.N., c/o Bertling Law Group, will testify regarding treatment  
 12 and care of Mr. Geyer and Mr. Mallett.

13       121. Julia Valdez, R.N., c/o Bertling Law Group, will testify regarding treatment  
 14 and care of Mr. Geyer.

15       122. Cheryl Clark, R.N., c/o Bertling Law Group, will testify regarding treatment  
 16 and care of Mr. Wayne.

17       123. Laurie Anderson, R.N., c/o Bertling Law Group, will testify regarding  
 18 treatment and care of Ms. Upshaw.

19       124. Tori Garcia, WHNP-BC, c/o Bertling Law Group, will testify regarding  
 20 treatment and care of Ms. Upshaw.

21       125. Katherine Conover, R.N., c/o Bertling Law Group, will testify regarding  
 22 treatment and care of Ms. Upshaw.

23       126. Tina Thomas-Robinson, P.A., c/o Bertling Law Group, will testify regarding  
 24 treatment and care of Ms. Upshaw.

25       127. Neena C. Thomas, N.P., c/o Bertling Law Group, will testify regarding  
 26 treatment and care of Ms. Upshaw.

27       128. Jessica Jimenez, R.N., c/o Bertling Law Group, will testify regarding  
 28 treatment and care of Ms. Upshaw.

1 129. Sarah Manimba, c/o Bertling Law Group, will testify regarding treatment  
2 and care of Ms. Upshaw.

3 130. Kawal Singh, c/o Bertling Law Group, will testify regarding treatment and  
4 care of Ms. Upshaw.

5 131. CFMG/Wellpath medical staff in the Santa Rita Jail who provided care to  
6 plaintiff Daniel Gonzalez, not limited to those individuals named above.

7 132. CFMG/Wellpath medical staff in the Santa Rita Jail who provided care to  
8 plaintiff Larry Gerrans, not limited to those individuals named above.

9 133. CFMG/Wellpath medical staff in the Santa Rita Jail who provided care to  
10 plaintiff Cedric Henry, not limited to those individuals named above.

11 134. CFMG/Wellpath medical staff in the Santa Rita Jail who provided care to  
12 plaintiff Michael Lockhart, not limited to those individuals named above.

13 135. CFMG/Wellpath medical staff in the Santa Rita Jail who provided care to  
14 plaintiff Randy Harris, not limited to those individuals named above.

15 136. CFMG/Wellpath medical staff in the Santa Rita Jail who provided care to  
16 plaintiff Eric Rivera, not limited to those individuals named above.

17 137. CFMG/Wellpath medical staff in the Santa Rita Jail who provided care to  
18 plaintiff Tikisha Upshaw, not limited to those individuals named above.

19 138. CFMG/Wellpath medical staff in the Santa Rita Jail who provided care to  
20 plaintiff Eric Wayne, not limited to those individuals named above.

21 139. CFMG/Wellpath medical staff in the Santa Rita Jail who provided care to  
22 plaintiff James Mallett, not limited to those individuals named above.

23 140. CFMG/Wellpath medical staff in the Santa Rita Jail who provided care to  
24 plaintiff Rasheed Tucker, not limited to those individuals named above.

25 141. CFMG/Wellpath medical staff in the Santa Rita Jail who provided care to  
26 plaintiff Darryl Geyer, not limited to those individuals named above.

27 142. CFMG/Wellpath medical staff in the Santa Rita Jail who provided care to  
28 plaintiff Timothy Phillips, not limited to those individuals named above.

1       143. CFMG/Wellpath medical staff in the Santa Rita Jail who provided care to  
 2 plaintiff Donald Corsetti, not limited to those individuals named above.

3       144. Individuals and witnesses to be identified during the course and scope of  
 4 discovery. Defendant specifically reserves the right herein to supplement and update  
 5 their Rule 26 disclosures pursuant to Federal Rule of Civil Procedure Rule 26(e).

6       **II. DOCUMENTS IN SUPPORT OF DEFENDANTS' DEFENSES**

7       1. Medical records related to Mr. Wayne from Santa Rita Jail were previously  
 8 produced at Bates numbers WELLPATH-DG 000001 – WELLPATH-DG 000964.

9       2. Medical records related to Mr. Mallett from Santa Rita Jail were previously  
 10 produced at Bates numbers WELLPATH-DG 000965 – WELLPATH-DG 001655.

11       3. Medical records related to Mr. Tucker from Santa Rita Jail were previously  
 12 produced at Bates numbers WELLPATH-DG 001656 – WELLPATH-DG 001768.

13       4. Medical records related to Mr. Phillips from Santa Rita Jail were previously  
 14 produced at Bates numbers WELLPATH-DG 001769 – WELLPATH-DG 003269.

15       5. Medical records related to Mr. Geyer from Santa Rita Jail were previously  
 16 produced at Bates numbers WELLPATH-DG 003270 – WELLPATH-DG 003804.

17       6. Medical records related to Mr. Henry from Santa Rita Jail were previously  
 18 produced at Bates numbers WELLPATH-DG 003805 – WELLPATH-DG 004140.

19       7. Medical records related to Mr. Gonzalez from Santa Rita Jail were  
 20 previously produced at Bates numbers WELLPATH-DG 004141 – WELLPATH-DG  
 21 004421.

22       8. Medical records related to Mr. Corsetti from Santa Rita Jail are produced  
 23 herewith at Bates numbers WELLPATH-DG 004422 – WELLPATH-DG 006044.

24       9. Medical records related to Mr. Rivera from Santa Rita Jail were previously  
 25 produced at Bates numbers WELLPATH-DG 006045 – WELLPATH-DG 006382.

26       10. Medical records related to Mr. Gerrans from Santa Rita Jail were previously  
 27 produced at Bates numbers WELLPATH-DG 006383 – WELLPATH-DG 006467.

11. Medical records related to Mr. Lockhart from Santa Rita Jail were previously produced at Bates numbers WELLPATH-DG 006468 – WELLPATH-DG 007303.

12. Medical records related to Mr. Harris from Santa Rita Jail were previously produced at Bates numbers WELLPATH-DG 007304 – WELLPATH-DG 007885.

13. Medical records related to Ms. Upshaw from Santa Rita Jail were previously produced at Bates numbers WELLPATH-DG 007886 – WELLPATH-DG 008597.

14. Medical records related to Mr. Misch from Santa Rita Jail were previously produced at Bates numbers WELLPATH-DG 008598 – WELLPATH-DG 009924.

15. Medical records related to Ms. Arnold from Santa Rita Jail were previously produced at WELLPATH-DG 009925 – WELLPATH-DG 010498.

16. Documents identified by Plaintiffs.

17. Documents identified by Defendants County of Alameda, Alameda County Sheriff's Office, Deputy Joe, and Deputy Ignont (sp), Deputy Lenahan, Sergeant MacBride, Deputy John Roe and Deputy Jane Roe.

18. Documents identified by Defendant Aramark Correctional Services, LLC.

19. Documents to be identified during the course and scope of discovery.

Defendant specifically reserves the right herein to supplement and update their Rule 26 disclosures pursuant to Federal Rule of Civil Procedure Rule 26(e).

### III. INSURANCE

Defendant California Forensic Medical Group is insured by ProAssurance Specialty Insurance Company, Policy Number ES1866-1. Insurance policy information, including limitations of liability, is produced herewith at Bates numbers WELLPATH-DG 010499.

Respectfully submitted,

BERTLING LAW GROUP, INC.

Dated: May 18, 2023

/s/ Peter G. Bertling

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Peter G. Bertling

Jemma Parker Saunders

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10 Attorneys for Defendants  
11 WELLPATH MANAGEMENT, INC.

12 **UNITED STATES DISTRICT COURT**  
13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

14 **ALAMEDA COUNTY MALE PRISONERS**

15 And Former Prisoners, DANIEL GONZALEZ,  
16 et al. on behalf of themselves and others  
17 similarly situated, as a Class, and Subclass;

18 **ALAMEDA COUNTY FEMALE**

19 **PRISONERS** And Former Prisoners, JACLYN  
20 MOHRBACHER, ERIN ELLIS, DOMINIQUE  
21 JACKSON, CHRISTINA ZEPEDA, ALEXIS  
22 WAH, AND KELSEY ERWIN, et al on behalf  
23 of themselves and other similarly situated,

24 Plaintiffs,

25 v.

26 **ALAMEDA COUNTY SHERIFF'S**  
27 **OFFICE, ALAMEDA COUNTY, Deputy Joe,**  
28 **Deputy Ignont (sp) Jane ROEs, Nos. 1 – 25;**  
29 **WELLPATH MANAGEMENT, INC., a**  
30 **Delaware Corporation (formerly known as**  
31 **California Forensic Medical Group) a**  
32 **corporation; its Employees and Sub-**  
33 **Contractors, and Rick & Ruth ROEs Nos. 26-**  
34 **50; ARAMARK CORRECTIONAL**  
35 **SERVICES, LLC, a Delaware Limited**  
36 **Liability Company; its Employees and Sub-**  
37 **Contractors, and Rick & Ruth ROES Nos.**  
38 **51-75,**

39 Defendants.

40 Case No.: 3:19-cv-07423 JSC

41 **CERTIFICATE OF SERVICE**

42 Action Filed: November 12, 2019  
43 Judge: Hon. Jacqueline Scott Corley  
44 Ctrm: E—15th Floor

1 I am employed in the County of Santa Barbara, State of California. I am over the  
 2 age of 18 years and not a party to the within action. My business address is 21 E. Canon  
 3 Perdido Street, Suite 204B, Santa Barbara, California 93101. My e-mail address is  
[stephanie@bertlinglawgroup.com](mailto:stephanie@bertlinglawgroup.com).

4 On **May 18, 2023**, I served a true copy of the following documents:

5

- 6 • **DEFENDANT WELLPATH MANAGEMENT, INC.'S INITIAL**  
**DISCLOSURES [FRCP RULE 26(a)]**
- 7 • **BATES WELLPATH-DG 004422 – WELLPATH-DG 006044,**  
**WELLPATH-DG 010499**

8 **Counsel for Plaintiffs:**

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 14 **THOMAS F. MADIGAN, D. HOUGHTELLING, CAPTAIN DERRICK C. HESSELEIN,**  
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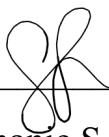
22 **[X] ELECTRONIC SERVICE**

23 Based on a court order or an agreement of the parties to accept electronic service,  
24 I caused the document to be sent to the person(s) at the electronic service  
25 address(es) above.

26 **[X] FEDERAL**

27 I declare under penalty of perjury under the laws of the United States of America  
28 that the above is true and correct and that I am employed in the office of a  
member of the bar of this Court at whose direction the service was made.

29 Executed on **May 18, 2023**, at Santa Barbara, California.

30   
31 \_\_\_\_\_  
32 Stephanie S. Aguiniga  
33